

REMARKS

This Application has been carefully reviewed in light of the Official Action mailed September 28, 2004. In order to advance prosecution of the present Application, Claims 1-20, 22, 23, 25-29, and 31-38 have been amended. Applicant respectfully requests reconsideration and favorable action in this Application.

The Examiner has requested drawings in compliance with 37 C.F.R. §1.121(d). Attached herewith for the Examiner's approval are corrected drawing replacement sheets.

Claims 5-11, 30-34, and 36 stand objected to for various informalities. Claim 36 has been amended to address an informality identified by the Examiner. As for the Examiner's request to provide a range for the variable *i*, Applicant respectfully submits that the claims appropriately show the variable *i* having a range of 1 to *n* in Claim 5 and 1 to *n*-1 in Claim 30. With respect to the range of variable *n*, Applicant respectfully submits that *n* can be any number and need not be limited to a specific value.

Claims 1-12 and 21-38 stand rejected under 35 U.S.C. §102(b) as being anticipated by Keren-Zvi, et al. Applicant respectfully traverses this rejection.

Independent Claim 1 recites ". . . a Failure Path that is connected to a Normal Path of an adjacent Working Processing Module, the Failure Path operable to provide a second signal output over the Normal Path of the adjacent Working Processing Module in response to a failure in the adjacent Working Processing module . . ." By contrast, the Keren-Zvi, et al. patent merely discloses connecting a failed active module to an auxiliary signal path through an adjacent module. Thus, the system of the Keren-Zvi, et al. patent does not provide a second output from a module on a failure path for connection

to a normal path of a failed module as required in the claimed invention.

Independent Claims 27 recites ". . . a first Failure Path connecting the first slot to the second Normal Path of the second slot in order to provide a signal output for the second Normal Path upon a failure associated with the second slot" By contrast, the Keren-Zvi, et al. patent does not provide a capability for a slot to provide a signal output for an adjacent slot upon a failure associated with the adjacent slot as provided by the claimed invention.

Independent Claim 31 recites ". . . the i th signal path includes an i th Normal Path that is connected to an i th slot, and an i th Failure Path that is connected to an $(i + 1)$ th Normal Path of an $(i + 1)$ th slot that is logically adjacent to the i th slot in order to provide a signal output for the $(i + 1)$ th slot upon a failure associated with the $(i + 1)$ th slot." By contrast, the Keren-Zvi, et al. patent merely connects a failed module to an auxiliary signal bus and thus is not capable of providing a signal output to the normal path of a failed module from an adjacent module as provided by the claimed invention.

Independent Claim 35 recites ". . . the Failure Path of the first Working processing Module operable to provide a signal output for the Normal Path of the second Working Processing Module upon a failure associated with the second Working processing Module" By contrast, the Keren-Zvi, et al. patent has no capability for one of its modules to provide a signal output for a failed adjacent module as required in the claimed invention.

Independent Claim 37 recites ". . . the Protection Processing Module becomes capable of providing a signal output to the slot associated with the failed Processing Module over the Protection Bus Segments" By contrast, the Keren-

Zvi, et al. patent isolates a failed module and prevents any active module from providing a signal output to a failed module.

Independent Claim 38 recites ". . . upon failure of the first Working Processing Module, a connection is formed from the Protection Processing Module to the Failure Path connected to the Processing Module that is logically adjacent to the first Working Processing Module in order to provide a signal output on the Normal Path of the first Working Processing Module." By contrast, the Keren-Zvi, et al. patent does not have a capability to provide a signal output onto a Normal Path of a failed module from an adjacent module as required in the claimed invention.

From the foregoing, the Keren-Zvi, et al. patent does not have sufficient disclosure to support a rejection of the claims. Support for the above recitations can be found in Paragraph 0045 of Applicant's specification. Therefore, Applicant respectfully submits that Claims 1-12 and 21-38 are not anticipated by the Keren-Zvi, et al. patent.

Claims 13 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Keren-Zvi, et al. in view of Carkner. Independent Claim 1, from which Claims 13 and 14 depend, has been shown above to be patentably distinct from the Keren-Zvi, et al. patent. Moreover, the Carkner patent does not include any additional disclosure combinable with the Keren-Zvi, et al. patent that would be material to patentability of these claims. Therefore, Applicant respectfully submits that Claims 13 and 14 are patentably distinct from the proposed Keren-Zvi, et al. - Carkner combination.

Claims 15-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Keren-Zvi, et al. Independent Claim 1, from which Claims 15-20 depend, has been shown above to be

patentably distinct from the Keren-Zvi, et al. patent.
Therefore, Applicant respectfully submits that Claims 15-20
are patentably distinct from the Keren-Zvi, et al. patent.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending claims.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.

Attorneys for Applicants



Charles S. Fish

Reg. No. 35,870

December 28, 2004

CORRESPONDENCE ADDRESS:

2001 Ross Avenue, Suite 600

Dallas, TX 75201-2980

(214) 953-6507

Customer Number: 05073